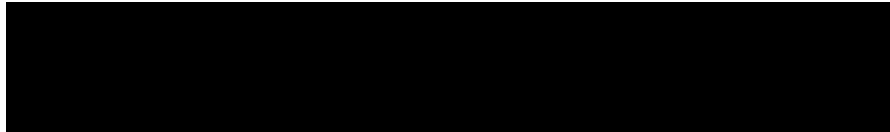


EXHIBIT 1



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD, et al.

Defendants.

Civil Case No. 2:22cv00293-JRG
(Lead Case)

JURY TRIAL DEMANDED

NETLIST, INC.

Plaintiff,

v.

MICRON TECHNOLOGY TEXAS, LLC, et al.

Defendants.

Civil Case No. 2:22cv-00294-JRG
(Member Case)

JURY TRIAL DEMANDED

**SAMSUNG DEFENDANTS' NOTICE OF
RULE 30(b)(6) DEPOSITION OF NETLIST, INC.**

Pursuant to Rule 30(b)(6), beginning at **9:00 a.m. ET on October 2, 2023**, at the law offices of Fish & Richardson P.C., **1000 Maine Ave SW, Washington, DC 20024**, or at a mutually agreed upon time and location, Defendants, Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Semiconductor, Inc. (collectively, "Defendants" or "Samsung"), by their undersigned attorneys will take the deposition upon oral and videotaped deposition of Plaintiff Netlist, Inc. ("Netlist"), by one or more officers, directors, or managing agents or other person(s) designated to testify on its behalf, regarding the Deposition Topics identified below.

TOPIC NO. 46:

All facts and circumstances relating to Netlist's relationship with Diablo Technologies, Inc. ("Diablo"), including but not limited to Diablo's role in developing Netlist's HCDIMM product, Diablo's contributions to the design, development, structure, and/or functionality of the HCDIMM product, Diablo's involvement with the Asserted Patents, and any legal or other proceedings involving Netlist and Diablo.

TOPIC NO. 47:

All facts and circumstances relating to Netlist's capacity to manufacture and market products embodying or analogous to the alleged inventions claimed by the Asserted Patents or products competing with such products.

TOPIC NO. 48:

Netlist's budgets, forecasts, units, sales, gross profits, and operating profits from 2015 to present of products it contends are covered by the Asserted Patents.

TOPIC NO. 49:

All facts and circumstances relating to the Joint Development and License Agreement ("JDLA") entered into as of November 12, 2015 between Netlist and Samsung, including the negotiation, performance, alleged breach, and purported termination of the JDLA.

TOPIC NO. 50:

All facts and circumstances relating to Your understanding of the Korean tax authority's determination that no withholding was necessary for payment made under the JDLA.

TOPIC NO. 51:

The factual basis pertaining to Your contention that any of the Accused Products were not licensed products under the 2015 JDLA to Netlist's termination of the agreement on July 15, 2020.

TOPIC NO. 52:

Any valuations, financial analyses or patent analyses for the patents licensed under the JDLA.

TOPIC NO. 53:

Netlist's guidelines, policies, protocols, or practices regarding the licensing and/or enforcement of the Asserted Patents and/or Related Patents.